

STEPHANIE M. HINDS (CABN 154284)  
Acting United States Attorney

HALLIE HOFFMAN (CABN 210020)  
Chief, Criminal Division

SCOTT D. JOINER (CABN 223313)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7234  
Scott.Joiner@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                           |   |                                      |
|---------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA, | ) | NO. CR 21-00490                      |
|                           | ) |                                      |
| Plaintiff,                | ) | STIPULATION AND ORDER SETTING CHANGE |
|                           | ) | OF PLEA HEARING                      |
| v.                        | ) |                                      |
|                           | ) |                                      |
| MOHAMMED NURU,            | ) |                                      |
|                           | ) |                                      |
| Defendant.                | ) |                                      |

The parties have reached an agreement to resolve the charges against the defendant. An executed plea agreement, attached as Exhibit 1, reflects the parties' agreement. In order to expedite this matter, and in light of the current COVID-19 pandemic, the parties are requesting that a change of plea hearing be held by videoconference on January 6, 2022, or as soon thereafter as convenient for the Court.<sup>1</sup>

The defendant voluntarily wishes to appear by video conference, has been advised by counsel, and understands the following: (1) he has the right under the Constitution and the Federal Rules of Criminal Procedure to be present at the proceeding; and (2) he understands that video conferencing is

<sup>1</sup> The government has filed a notice of related case for this matter as to *U.S. v. Bovis*, No. CR 20-00204 WHO, *U.S. v. Wong*, No. CR 20-00257 WHO, *U.S. v. Hernandez*, No. CR 20-00353 WHO, *U.S. v. Zuniga*, No. CR 21-00096 WHO, *U.S. v. Varela, et al.*, No. CR 21-00192 WHO, and *U.S. v. Giusti*, No. 21-00294 WHO. Subject to the Court's discretion, the requested date above reflects the first available date on Judge Orrick's criminal calendar.

1 the projection of live camera video and audio between participants.

2 SO STIPULATED.

3  
4 DATED: December 17, 2021

STEPHANIE M. HINDS  
Acting United States Attorney

5  
6 /s/  
7 SCOTT D. JOINER  
Assistant United States Attorney

8  
9 DATED: December 17, 2021


10 /s/  
ISMAIL RAMSEY  
Ramsey & Ehrlich LLP  
Attorneys for Defendant

11  
12  
13 **ORDER**

14 Pursuant to stipulation, the above-captioned matter will be set for a change of plea hearing on  
15 January 6, 2022 at 1:30 p.m. The parties will appear by videoconference.

16 IT IS SO ORDERED.

17  
18 DATED: December 20, 2021

19   
HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE